

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

MICHAEL MOATES, individually and on
behalf of DC CHRONICLE,

Plaintiffs,

v.

FACEBOOK, INC., FACEBOOK
PAYMENTS, INC, MARK ZUCKERBERG,
as Chief Executive Officer, SHERYL
SANDBERG, as Chief Operating Officer,

Defendants.

Civil Action No. 4:20-cv-00896-ALM-KPJ

STIPULATED MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

Plaintiffs Michael Moates and DC Chronicle and Defendants Facebook, Inc., Facebook Payments, Inc., Mark Zuckerberg, and Sheryl Sandberg hereby stipulate and agree as follows:

1. Plaintiff Michael Moates shall file a second amended complaint against Defendant Facebook, Inc. on or before January 4, 2021.
2. Facebook, Inc. will waive service of the second amended complaint.
3. The second amended complaint will not name Facebook Payments, Inc., Mark Zuckerberg, or Sheryl Sandberg as Defendants, and will not name DC Chronicle as a Plaintiff, thereby effectively dismissing those parties.
4. Facebook, Inc. shall respond to the second amended complaint by February 3, 2021.

WHEREFORE, Plaintiffs and Defendants request the Plaintiff Moates be granted leave to file a second amended complaint on the terms listed above.

Respectfully submitted,

/s/ Michael Moates

(by E. Glenn Thames, Jr., with permission)

Michael Moates (Individually, and on behalf
of DC Chronicle)

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Plaintiffs, *Pro Se*

/s/ E. Glenn Thames, Jr.

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Attorneys for Defendants FACEBOOK,
INC., FACEBOOK PAYMENTS, INC,
MARK ZUCKERBERG, SHERYL
SANDBERG

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that the parties have met and conferred regarding the
above and foregoing motion and that it is agreed.

/s/ E. Glenn Thames, Jr.

E. Glenn Thames, Jr.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with this document via the Court's CM/ECF system pursuant to Local Rule CV-5. Service outside the court's electronic-filing system has been completed on December 18, 2020 as follows:

Michael Moates
2700 Colorado Blvd. #1526
Denton, TX 76201
PLAINTIFF, *pro se*

Certified Mail – Return Receipt Requested
and email to: michael.moates@thenarrativetimes.org
michaelsmoates@gmail.com

/s/ E. Glenn Thames, Jr.

E. Glenn Thames, Jr.